

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SONDRA G. DRUKER

Plaintiff

V.

THOMAS JEFFERSON UNIVERSITY

and

BARBARA J. TURNER, M.D.

Defendants

CIVIL ACTION

NO. 02-CV-2692

**DEFENDANTS' EXHIBITS AND AFFIDAVITS FILED IN SUPPORT
OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

1. Curriculum Vitae of Barbara J. Turner, M.D.
2. Deposition excerpts of Sondra G. Druker
3. Deposition excerpts of Barbara J. Turner, M.D.
4. Memorandum from Barbara J. Turner, M.D. to Angela C. Cimino dated February 23, 1998 regarding Sondra G. Druker
5. Deposition excerpts of Craig J. Newschaffer
6. Deposition excerpts of James Ralph Cocroft
7. Deposition excerpts of Daniel Louis
8. Memorandum from Sondra Druker to Martha A. Anderson dated January 23, 1998 regarding Racist Literature Found on Campus
Memorandum from Sondra Druker to Johanna J. Schoeller dated January 14, 1998 regarding Discriminatory Materials Found on Campus
9. Relevant excerpts of Sondra Druker's Log
10. Email from Sondra Druker to Dr. Barbara Turner dated June 3, 1998 regarding Moving On

11. Emails between Dr. Barbara Turner and Sondra Druker regarding Additional Phone Duty
12. Email from Sondra Druker to Daniel Louis dated October 15, 1998 regarding telephones
13. Memorandum from Daniel Z. Louis to Sondra Druker dated October 29, 1998 regarding Your Email to me of October 15, 1998
14. Letter from Sondra Druker to Dr. James Erdmann (undated)
Letter from Sondra Druker to Dr. James Erdmann dated October 29, 1998
15. Deposition excerpts of James B. Erdmann, Ph.D.
16. Letter from Sondra Druker to Johanna J. Schoeller dated November 3, 1998
17. Email from Sondra Druker to Dr. Barbara Turner dated January 2, 1999 regarding Weekend Overtime
18. Affidavit of Brian P. Bowie
19. Letter from Eric D. Righter to Dianne Vallejo-Benus (EEOC) dated May 10, 2001 regarding Sondra Druker
20. Memorandum from Sondra Druker to Mary Legner dated November 22, 1999 regarding Seeking Alternative Employment at Thomas Jefferson University
21. Affidavit of Bruce Boman, M.D., Ph.D.
22. Charge Questionnaire of Sondra G. Druker dated June 1, 1999
23. Letter from Joan D. Gmitter of the U.S. Equal Employment Opportunity Commission to Sondra Druker dated July 23, 1999 regarding Druker vs. Thomas Jefferson University
24. Amended Charge of Discrimination, Charge No. 170A00980
25. Affidavit of William D. Cook, EEOC
26. Memorandum from Sondra Druker to Dr. Barbara Turner dated June 10, 1999 regarding Complaint of Continuing Discrimination, Hostile Environment, and Retaliation
27. Memorandum from Sondra Druker to Eric Righter dated June 1, 1999 regarding Complaint of Continuing Discrimination and Hostile Environment
28. Memorandum from Sondra Druker to Eric Righter dated August 25, 1999 regarding Dr. Barbara J. Turner Ongoing Inappropriate Behavior
29. Memorandum from Sondra Druker to Eric Righter dated October 29, 1999 regarding Continuing Difficulty at the Center for Research in Medical Education and Health Care
30. Letter from Daniel Z. Louis to Sondra Druker dated November 30, 1999

31. Letter from Daniel Z. Louis to James Cocroft dated November 30, 1999
32. Deposition excerpts of Dr. Geno Merli
33. Affidavit of Elizabeth Smith
34. Affidavit of Thomas Falkowski
35. Affidavit of Barry Goldstein, M.D.
36. Affidavit of Eric Pownall
37. Affidavit of Cheryl Scully
38. Affidavit of Regina Gallagher
39. Affidavit of Ronald Myers, Ph.D.
40. Letter from Debra A. Jensen, Esquire to Eric Righter dated December 17, 1999, regarding Sondra Druker
41. Letter from Brian P. Bowie to Debra A. Jensen, Esquire dated December 29, 1999, regarding Sondra Druker
42. Charge of Discrimination, Charge No. 170A01829
43. Letter from Wayne A. Hamilton, Esquire to U.S. Equal Employment Opportunity Commission dated September 24, 2001 regarding Druker v. Thomas Jefferson University, EEOC Charge No. 170A00980
44. Notice of Right to Sue on Charge No. 170A00980 issued by U.S. Equal Employment Opportunity Commission dated September 27, 2001
45. Plaintiff's Responses to Defendant's First Set of Interrogatories
46. Notice of Right to Sue on Charge No. 170A01829 issued by U.S. Equal Employment Opportunity Commission dated October 29, 2001
47. Writ of Summons
48. Complaint, Sondra Druker v. Thomas Jefferson University and Barbara Turner, M.D., Court of Common Pleas, Philadelphia County, January Term 2002, No. 003657